

[Submitting Counsel on signature page]

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

THIS DOCUMENT RELATES TO:
ALL ACTIONS.

**EVIDENTIARY STIPULATION AND
PROPOSED ORDER REGARDING
YOUTUBE’S PRODUCTION FROM
NONCUSTODIAL SOURCES**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

IT IS HEREBY STIPULATED by and between Defendants YouTube, LLC and Google LLC (together, “YouTube”), and PI/SD Plaintiffs (collectively, the “Parties”), by and through their respective counsel of record that:

The documents identified in the attached **Exhibit A** are true and correct copies of data stored in YouTube’s F Source. F Source is a YouTube repository and complaints tracking system that stores customer service tickets, reports, and related information, which can also be used by Googlers to communicate with users. F Source is currently used by various YouTube legal operation teams to respond to complaints from external parties, as well as internal escalations, appeals, and other use cases. These documents are records of regularly conducted activity under Fed. R. Evid. 803(6). This data from F Source was collected and produced in the manner described

1 in **Exhibit A**. This stipulation is not intended to address the admissibility of the underlying
2 statements made by the individuals submitting user feedback, which YouTube reserves the right
3 to challenge on any and all grounds permitted by applicable state or federal law, or the Federal
4 Rules of Evidence.

5 The documents identified in the attached **Exhibit B** are true and correct copies of data
6 stored in Google's L Source. L Source is a Google-wide platform that stores and provides an
7 interface tool for user feedback and surveys. L Source permits the operations team to review
8 feedback, assign issues tags, and take action. These documents are records of regularly conducted
9 activity under Fed. R. Evid. 803(6). This data from L Source was collected and produced in the
10 manner described in **Exhibit B**. This stipulation is not intended to address the admissibility of the
11 underlying statements made by the individuals submitting user feedback, which YouTube reserves
12 the right to challenge on any and all grounds permitted by applicable state or federal law, or the
13 Federal Rules of Evidence.

14 The documents identified in the attached **Exhibit C** are true and correct copies of data
15 stored in Google's A Source. A Source is an internal launch release tool and repository of past
16 launches. A Source contains records detailing information on feature development, launches, and
17 related approvals. These documents are records of regularly conducted activity under Fed. R. Evid.
18 803(6). This data from A Source was collected and produced in the manner described in **Exhibit**
19 **C**.

20 The documents identified in the attached **Exhibit D** are true and correct copies of data
21 stored in Google's B Source. B Source is an internal Google-wide application that stores data and
22 communications related to a wide range of tickets (or "issues") related to escalation of bugs,
23 glitches, or other internal and external requests and questions. These documents are records of
24 regularly conducted activity under Fed. R. Evid. 803(6). This data from B Source was collected
25 and produced in the manner described in **Exhibit D**. This stipulation is not intended to address the
26 admissibility of the underlying statements made by the individuals submitting user feedback,
27 which YouTube reserves the right to challenge on any and all grounds permitted by applicable
28 state or federal law, or the Federal Rules of Evidence.

1 The documents identified in the attached **Exhibit E** are true and correct copies of data
2 stored in YouTube's M Source, originating from the S Source. The S Source is a third-party
3 customer experience management platform that stores social media posts, interactions, and related
4 information. These documents are records of regularly conducted activity under Fed. R. Evid.
5 803(6). This data from the M Source was collected and produced in the manner described in
6 **Exhibit E**. This stipulation is not intended to address the admissibility of the underlying statements
7 made by the individuals submitting user feedback, which YouTube reserves the right to challenge
8 on any and all grounds permitted by applicable state or federal law, or the Federal Rules of
9 Evidence.

10 1. The documents identified in the attached **Exhibit F** are true and correct copies of
11 data stored in YouTube's C Source. The C Source is a deprecated customer experience
12 management platform that stores social media posts, interactions, and related information. These
13 documents are records of regularly conducted activity under Fed. R. Evid. 803(6). This data from
14 the C Source was collected and produced in the manner described in **Exhibit F**. This stipulation
15 is not intended to address the admissibility of the underlying statements made by the individuals
16 submitting user feedback, which YouTube reserves the right to challenge on any and all grounds
17 permitted by applicable state or federal law, or the Federal Rules of Evidence.

18 The Parties may mutually agree to amend Exhibits A-F to the extent additional documents are
19 later produced or identified.

20 This Stipulation applies to this action only and accordingly can be relied upon and asserted
21 by only the Parties to this action. This Stipulation is not intended for use in any other proceeding
22 and, as such, may not be cited or used against any Party in any other proceeding by any party or
23 third party.

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25 **IT IS SO STIPULATED AND AGREED,**
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27
28

1 DATED: August 25, 2025

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

2
3 By: /s/ Christopher Chiou
Christopher Chiou (State Bar No. 233587)
Matthew K. Donohue (State Bar No. 302144)
4 **WILSON SONSINI GOODRICH & ROSATI PC**
953 East Third Street, Suite 100
5 Los Angeles, CA 90013
Telephone: (323) 210-2900
6 Facsimile: (866) 974-7329
Email: cchiou@wsgr.com
7 Email: mdonohue@wsgr.com

8 Brian M. Willen (*pro hac vice*)
9 **WILSON SONSINI GOODRICH & ROSATI PC**
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
10 Telephone: (212) 999-5800
Facsimile: (212) 999-5899
11 Email: bwillen@wsgr.com

12 Lauren Gallo White (State Bar No. 309075)
Samantha A. Machock (State Bar No. 298852)
13 **WILSON SONSINI GOODRICH & ROSATI PC**
One Market Plaza, Spear Tower, Suite 3300
14 San Francisco, CA 94105
Telephone: (415) 947-2000
15 Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
16 Email: smachock@wsgr.com

17 *Attorneys for Defendants YouTube, LLC and*
18 *Google LLC*

19 DATED: August 25, 2025

20 By: /s/ Lexi Hazam
LEXI J. HAZAM
21 **LIEFF CABRASER HEIMANN &**
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, CA 94111-3339
22 Telephone: 415-956-1000
lhazam@lchb.com

23
24 PREVIN WARREN
MOTLEY RICE LLC
401 9th Street NW Suite 630
25 Washington DC 20004
Telephone: 202-386-9610
26 pwarren@motleyrice.com

27 Co-Lead Counsel
28

1 CHRISTOPHER A. SEEGER
2 **SEEGER WEISS, LLP**
3 55 Challenger Road, 6th floor
4 Ridgefield Park, NJ 07660
Telephone: 973-639-9100
Facsimile: 973-679-8656
cseeger@seegerweiss.com

5 Counsel to Co-Lead Counsel and Settlement
6 Counsel

7 JENNIE LEE ANDERSON
8 **ANDRUS ANDERSON, LLP**
9 155 Montgomery Street, Suite 900
San Francisco, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

10 Liaison Counsel

11 JOSEPH G. VANZANDT
12 **BEASLEY ALLEN CROW METHVIN**
13 **PORTIS & MILES, P.C.**
14 234 Commerce Street
Montgomery, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com
15 EMILY C. JEFFCOTT
16 **MORGAN & MORGAN**
17 220 W. Garden Street, 9th Floor
Pensacola, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

18 Federal/State Liaison Counsel

19 MATTHEW BERGMAN
20 **SOCIAL MEDIA VICTIMS LAW CENTER**
21 821 Second Avenue, Suite 2100
Seattle, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
22 JAMES J. BILSBORROW
23 **WEITZ & LUXENBERG, PC**
24 700 Broadway
New York, NY 10003
Telephone: 212-558-5500
Facsimile: 212-344-5461
jbilsborrow@weitzlux.com
25 JAYNE CONROY
26 **SIMMONS HANLY CONROY, LLC**
27 112 Madison Ave, 7th Floor
New York, NY 10016
Telephone: 917-882-5522
28 jconroy@simmonsfirm.com

1 ANDRE MURA
2 **GIBBS LAW GROUP, LLP**
3 1111 Broadway, Suite 2100
4 Oakland, CA 94607
5 Telephone: 510-350-9717
6 amm@classlawgroup.com
7 ALEXANDRA WALSH
8 **WALSH LAW**
9 1050 Connecticut Ave, NW, Suite 500
10 Washington D.C. 20036
11 Telephone: 202-780-3014
12 awalsh@alexwalshlaw.com

13 MICHAEL M. WEINKOWITZ
14 **LEVIN SEDRAN & BERMAN, LLP**
15 510 Walnut Street Suite 500
16 Philadelphia, PA 19106
17 Telephone: 215-592-1500
18 mweinkowitz@lfsbalw.com
19 Plaintiffs' Steering Committee Leadership

20 RON AUSTIN
21 **RON AUSTIN LAW**
22 400 MANHATTAN BLVD
23 HARVEY, LA 70058
24 Telephone: 504-227-8100
25 raustin@ronaustinlaw.com

26 PAIGE BOLDT
27 **WATTS GUERRA LLP**
28 4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
Telephone: 210-448-0500
PBoldt@WattsGuerra.com
THOMAS P. CARTMELL
WAGSTAFF & CARTMELL LLP
4740 Grand Avenue, Suite 300
Kansas City, MO 64112
Telephone: 816-701 1100
tcartmell@wcllp.com

SARAH EMERY
HENDY JOHNSON VAUGHN EMERY, PSC
2380 Grandview Drive
Ft. Mitchell, KY 41017
Telephone: 888-606-5297
semery@justicestartshere.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
Telephone: (646) 666-8908
carrie@cagoldberglaw.com

RONALD E. JOHNSON, JR.

1 **HENDY JOHNSON VAUGHN EMERY, PSC**
2 600 West Main Street, Suite 100
3 Louisville, KY 40202
4 Telephone: 859-578-4444
5 rjohnson@justicestartshere.com
6 **SIN-TING MARY LIU**
7 **AYLSTOCK WITKIN KREIS &**
8 **OVERHOLTZ, PLLC**
9 17 East Main Street, Suite 200
10 Pensacola, FL 32502
11 Telephone: 510-698-9566
12 mliu@awkolaw.com

13 **JAMES MARSH**
14 **MARSH LAW FIRM PLLC**
15 31 Hudson Yards, 11th floor
16 New York, NY 10001-2170
17 Telephone: 212-372-3030
18 jamesmarsh@marshlaw.com

19 **HILLARY NAPPI**
20 **HACH & ROSE LLP**
21 112 Madison Avenue, 10th Floor
22 New York, New York 10016
23 Telephone: 212.213.8311
24 hnappi@hrsclaw.com
25 **EMMIE PAULOS**
26 **LEVIN PAPANTONIO RAFFERTY**
27 316 South Baylen Street, Suite 600
28 Pensacola, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, P.C.
1500 Rosecrans Ave., Ste. 500
Manhattan Beach, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

MELISSA YEATES
JOSEPH E. MELTZER
KESSLER TOPAZ MELTZER & CHECK, LLP
280 King of Prussia Road
Radnor, PA 19087
Telephone: 610-667-7706

1 myeates@ktmc.com
2 jmeltzer@ktmc.com

3 DIANDRA “FU” DEBROSSE ZIMMERMANN
4 **DICELLO LEVITT**
5 505 20th St North Suite 1500
6 Birmingham, Alabama 35203
7 Telephone: 205.855.5700
8 fu@dicellolevitt.com

9 Plaintiffs’ Steering Committee Membership

10 *Attorneys for Plaintiffs*
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
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ATTESTATION

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 25, 2025

By: /s/ Christopher Chiou
Christopher Chiou

ORDER

IT IS SO ORDERED that the foregoing Stipulation is approved:

DATED: _____

Hon. Peter H. Kang
United States District Court Magistrate Judge